

1 RICHARD SEGERBLOM, ESQ.
2 Nevada Bar No. 1010
3 700 South Third Street
4 Las Vegas, Nevada 89101
5 Tel: (702) 388-9600
6 Fax: (702) 385-2909
7 Attorney for Plaintiff
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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA
12

13 PAULA SCHNORR)
14 vs.) Plaintiff,
15 PHILIPS HEALTHCARE)
16 Defendant.)
17

Case No. 2:10-cv-01553

18 **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER**
19 **SUBMITTED IN COMPLIANCE WITH LOCAL RULE 26-1(e)**

20 The above-named parties, by and through their respective counsel of record, hereby
21 submit their stipulated discovery plan and scheduling order pursuant to Local Rule 26-1(e)
22 for the Court's approval.

23 **PROPOSED SCHEDULE**

24 1. **Estimate of time required for discovery:** Discovery will take 180
25 days from October 26, 2010, which is the date the Defendant answered or otherwise made
26 an appearance in this case. All discovery must be completed not later than April 24, 2011.
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28 2. **Amendment of pleadings and addition of parties:** Unless otherwise
29 stated herein or ordered by the Court, the date for filing motions to amend the pleadings or
30 to add parties shall not be later than ninety (90) days prior to the discovery cut-off date and

1 not later than January 24, 2011.

2 3. Disclosure of Expert Witnesses: In accordance with Fed. R. Civ. P.
3 26(a)(2), disclosures identifying experts shall be made sixty (60) days prior to the
4 discovery cut-off date and not later than February 23, 2011, and disclosures respecting
5 rebuttal experts shall be made thirty (30) days after the disclosure of experts and not later
6 than March 24, 2011.

7 4. Interim Status Report: On or before February 23, 2011, sixty (60) days
8 prior to the close of discovery, the parties shall file an Interim Status Report, as required
9 by LR 26-3, stating the time estimated for trial, three alternative dates for trial, and
10 whether or not trial will be proceeding or affected by substantive motions.

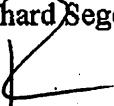
11 5. Dispositive Motions: The parties shall have until May 24, 2011, to file
12 dispositive motions. This is thirty (30) days after the close of discovery.

13 6. Pretrial Order: If no dispositive motions are filed, the Joint Pretrial Order
14 shall be filed by June 22, 2011, which is no later than thirty (30) days after the date set for
15 the filing of dispositive motions. In the event dispositive motions are filed, the date for
16 filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision on the
17 dispositive motions or by further order of the Court.

18 7. Extensions or Modifications of the Discovery Plan and Scheduling
19 Order: In accordance with LR 26-4, any stipulation or motion for modification or
20 extension of this discovery plan and scheduling order must be made no later than
21 twenty (20) days before the discovery cut-off date, or no later than April 4, 2011.

22 DATED this 24th day of November, 2010.

23 Richard Segerblom, Ltd.

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25 Richard Segerblom, ESQ.
26 700 S. Third Street
27 Las Vegas, Nevada 89101
28 Attorney for Defendant

McGuire Woods, LLP


Michael R. Phillips, Esq.
77 W. Wacker Drive
Chicago, IL 60601-1818
Attorney for Defendants

28 IT IS SO ORDERED this 30th day of
November, 2010.

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Peggy A. Leen
United States Magistrate Judge